

REMARKS

1. Independent Claims 1, 17, 18 and 35 have been amended to further clarify that the reconfiguration of the global default directory occurs “without user intervention”. During an October 4, 2005 telephone interview (“Interview”), the Examiner indicated the foregoing amendment would effectively distinguish Applicant’s claimed invention from U.S. Pat. No. 6,314,408 to Salas et al. (“Salas”) for purposes of overcoming Examiner’s 35 U.S.C. 103(a) rejection of Claim 1-33 and 35. In the Office Action, the Examiner cited Salas to suggest that Salas teaches “automatically reconfiguring a copy of a global directory based on a user customization data file”. As mentioned during the Interview, the Applicant, reading through the cited material, cannot find any evidence suggesting that Salas teaches “automatically reconfiguring a copy of a global directory based on a user customization data file”. Rather, Salas teaches a user to manually download a file from a server, edit it locally, and then upload the updated file to a server. However, to further emphasize the automatic process of Applicant’s invention, and as tentatively agreed to by the Examiner during the Interview, Applicant is amending element “c” of Claim 1 by adding the phase “without user intervention”. To further differentiate from Salas and Netscape, that element of Claim 1 now reads “automatically, without user intervention, reconfiguring a copy of a portion of said global default directory based on said user customization data file, thereby creating an individualized view of a user directory”. In light of these remarks and amendments, the Applicant respectfully requests the Examiner to allow this claim as tentatively agreed by the Examiner.

Regarding the Examiner's reliance on Netscape for rejecting Claim 1, Netscape does not teach a method for "prearranging computer files to form a global default directory." In contrast to Netscape, Applicant's invention comprises a method of arranging files (see Applicant's Fig. 3, "Arrange Files 16", and Fig. 5) to form a global Internet/Intranet directory (see Applicant's Fig. 3, "Global Internet Directory 10"). Netscape with its "Bookmarks" feature consists of only a local default list of pre-stored links, which does not constitute a method to arrange files to form a global Internet/Intranet directory.

In addition, Netscape does not teach a method for retrieving user customization data or for "maintaining user customization data in a user customization data file". Netscape teaches a user to directly edit or modify its locally stored default directory. Once modified, Netscape's default directory is *overwritten*. Thus, Netscape does not teach a method for "maintaining user customization data in a user customization data file." In contrast to Netscape, Applicant's invention comprises a method for "maintaining user customization data in a user customization data file" (see Applicant's Fig. 3, "User's Delta File 14") in order to "automatically, without user intervention, reconfigure a copy of a portion of said global default directory based on said user customization data file, thereby creating an individualized view of a user directory" (see Applicant's Fig. 3, "Constructing User's Directory 18", and Fig. 7.) for each user. Claims 1, 17, 18 and 35 are amended by changing "user directory" to "view of a user directory" to further emphasize that each user has his/her view of the directory based on his/her user customization data file. Likewise, the language of Claims 1, 17, 18 and 35 are further revised to state "reconfiguring a copy of *a portion of* said global default directory." This

revision is made only for purposes of clarification and is not made in response to any rejection or any issue of patentability.

2. As per claim 2, Netscape and Salas do not teach a method for creating a global default directory that includes files in the Internet and/or an Intranet. Each user of Netscape has her own local default listing of links. It does not teach a central global directory. Although Salas allows up loading a local file to a server, using Netscape and Salas will result in multiple files or directories on a server. Netscape and Salas do not maintain an updatable global directory.

3. As per claim 3, Netscape allows adding links or removing links from its *locally* stored list. In contrast, Applicant's invention comprises adding files into or removing files from a *global* default directory.

4. As per claim 4, Netscape does not allow multiple client computers to access a particular user's local Bookmark files. Applicant's invention allows multiple client computers to access a global default directory on a server computer with each client seeing *an individualized view of* the global default directory or a portion thereof. Even allowing the combination of Salas with Netscape, the combination would only allow uploading a local Bookmark list to a sever, thereby resulting in each user having his/her own Bookmark files on a server. With millions of users there will be millions of directories uploaded to the server. Thus, they do not have a single global directory that can be accessed and continuously updated by multiple client computers.

5. As per claim 5, Netscape does not store user customization data. It simply replaces the stored listing with new one.

6. As per claim 6, Netscape provides a user interface for modifying locally stored links, while the Applicant's invention provides a user interface for modifying the view of a global directory stored on a server. With the Applicant's invention, a user does not need to manually download a file, edit it, and then upload to a server, as is required in Salas.

7. As per claim 7, Netscape teaches modification of locally stored links while the Applicant's invention provides methods for modifying the view of a user global default directory stored on a server.

8. As per claim 8, Netscape does not have a user customization data file. Any modification by a user of Netscape directly updates and replaces the original default listing.

9. As per claim 9, Netscape and Salas do not provide any method for collecting user customization data. Even if multiple users manually upload files to a server, as would be the case if combining Netscape with Salas, the files would be stored individually and NOT as a single global default directory.

10. As per claim 10, Netscape and Salas do not teach sending each user request of a file or folder modification from a client computer to a server computer. Even when combined with Salas (col. 12, lines 31-61), the modified Netscape requires each user to manually download a file, modify the file, and then manually upload the file to a server.

11. As per claim 11, Netscape and Salas do not disclose a method of updating a global usage history based on subsequent user requests to modify or arrange files or folders. Netscape and Salas do not teach or disclose a "global usage history" nor do they

provide any method of updating a “global usage history”. Applicant’s invention specifically provides a method (see Fig. 3, “Collecting Usage History 19” and Fig. 8) for updating a global usage history (see Fig. 3, item 11).

12. As per claim 12, Netscape and Salas do not provide a method for recording a particular directory modification specified by a user request and the number of requests specifying a particular modification. Although Salas (col. 14, lines 25-55) describes a method to “prepare” a data query based on the usage of execution “statements” in order to offer “significant performance improvements” of ODBC database, the method cannot simply be combined with Netscape since Netscape does not send user’s modification requests to a server.

13. As per claim 13, Netscape does not have a global usage history. Even though Salas used a database, Netscape and Salas, when combined, do not comprise storing a global usage history in a database, simply because there is not a global usage history disclosed in Netscape.

14. As per claim 14, Netscape and Salas do not provide a method for updating a global default directory based on a global usage history. First, Netscape does not send a user modification request to a server and it does not have a global usage history. Second, neither Netscape nor Salas provide a method for updating a global default directory. Applicant’s invention specifically provides a method for updating a global default directory based on a global usage history (see Applicant’s Fig. 3, “Updating Global Directory 21”, and Fig. 10).

15. As per claim 15, Netscape and Salas do not comprise adding, removing, or renaming files or folders in a global default directory based on a global usage history. Netscape allows modification of local links stored on a user's computer. It does not have a global default directory that can be modified by multiple users. It also does not collect a global usage history simply because the user's modifications are not sent to a server. Although Salas allows a user to upload a file to a sever, the combination of Netscape and Salas still does not comprise a global usage history. They simply do not provide any methods to consolidate all the user files to form a global usage history.

16. As per claim 16, Netscape and Salas do not comprise modifying attributes of files or folders in a global default directory based on a global usage history for the same reason as provided above for Paragraph 15.

17. As per claim 17 to claim 33, they have similar scope as some of the above claims and should be reconsidered for allowance based on similar rationale.

18. As per claim 35, Netscape and Salas do not teach automatically retrieving a user customization data each time the global default directory is accessed by reading the user customization data file. Netscape's Bookmark files are local to each user, wherein each user can directly update and replace only those Bookmark files that are stored locally. Netscape does not, however, teach having a global default directory. In addition, Netscape does not have user customization data file. Although Salas can be used by users to manually upload files to a server, the multiple Bookmark files do not constitute a global default directory. This also does not constitute automatically retrieving user customization data.

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19. Claims 36-39 are new. The dependent claims limit the global default directory to a global "Internet" directory.

20. Applicant respectfully submits that the above new and amended claims are now in condition for allowance and respectfully requests allowance of the same case.

Respectfully Submitted:

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